

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	
Professional Fee Matters Concerning the	§	Civil Action No. 4:23-CV-4787-AM
Jackson Walker Law Firm	§	
	§	

JACKSON WALKER LLP’S MOTION FOR SCHEDULING CONFERENCE

To the Honorable Alia Moses, Chief United States District Judge:

Jackson Walker LLP files this motion requesting the Court set a scheduling conference in this matter regarding certain pre-trial and trial items, and in support thereof states as follows:

1. This Court held a status conference on May 22, 2025, wherein the parties discussed, among other things, the status of the pending motions and related documents in the 33 bankruptcy cases over which this Court is now presiding.

2. At the conclusion of the status conference, the Court listed some “prerequisites to setting any hard and fast time for the trial itself,” namely:

- a. “potential mediation among the main parties”;
- b. “a better sense in terms of where the criminal case is”;
- c. “those cases where there is a potential settlement or settlement”; and
- d. “any of the standing matters that Jackson Walker has also brought up.”

See Dkt. No. 82, May 22, 2025 Hr’g Tr. at 105:24-106:19.

3. On July 7, 2025, the Court entered an *Order* ordering the parties to complete mediation by 5:00 p.m. on July 15, 2025 and to file a joint notice informing the Court of the results. The Court also indicated that it would set this case for trial if a settlement is not reached. *See Order*, Dkt. No. 86.

4. On July 15, 2025, the parties filed a joint notice, informing the Court that the mediation did not result in resolution of the parties' disputes. *See* Dkt. No. 87. Despite the conclusion of the mediation, Jackson Walker is amenable to continuing informal settlement discussions with the U.S. Trustee.

5. Jackson Walker therefore requests a scheduling conference to set dates and deadlines regarding, among other things:

- a. A deadline for Jackson Walker to respond to the U.S. Trustee's *Motion to Consolidate* [Dkt. No. 59] and related hearing date;
- b. A hearing date for the pending settlement motions and any additional settlement motions filed in advance of such hearing;
- c. A hearing date regarding Jackson Walker's and the U.S. Trustee's standing briefs;¹ and
- d. Dates related to pre-trial and trial, including what issues will proceed to trial first.²

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¹ Jackson Walker has challenged the U.S. Trustee's standing to proceed on the portion of his Rule 60 Motions that request disgorgement of fees. *See In re La Forta – Gestao e Investimentos*, Case No. 22-90126, Dkt. Nos. 351 and 355; *In re Altera Infrastructure Project Services LLC, et al.*, Case No. 22-90129, Dkt. Nos. 142 and 150.

² *See Memorandum Opinion and Order* [Dkt. No. 31] ("In conjunction with the Court's withdrawal, the Court finds that a status conference is necessary in order to discuss what procedural avenues these cases should follow moving forward—specifically, which issues are best decided by this Court or the Bankruptcy Court.").

Pursuant to Chief Judge Rodriguez's prior *Order* dated March 21, 2025, trial was to commence on May 12, 2025 regarding "whether the final orders allowing compensation and reimbursement of expenses for Jackson Walker LLP should be vacated in each of the cases cited in the instant Miscellaneous Proceeding." *See* Case No. 23-645, Dkt. No. 618. At the time the reference was withdrawn, the parties had been operating under Chief Judge Rodriguez's *Amended Comprehensive Scheduling, Pre-Trial & Trial Order*, dated February 27, 2025, as amended on March 5, 2025 (the "Scheduling Order"), and were in the process of preparing a proposed form of pretrial order as laid out in Chief Judge Rodriguez's Scheduling Order. *See* Case No. 23-645, Dkt. Nos. 604 and 611.

Dated: July 21, 2025

NORTON ROSE FULBRIGHT US LLP

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Counsel for Jackson Walker LLP

CERTIFICATE OF SERVICE

I certify that on July 21, 2025, a true and correct copy of the foregoing was filed via the CM/ECF system which served the document on all counsel of record.

/s/ Julie Harrison
Julie Harrison

CERTIFICATE OF CONFERENCE

I certify that on July 18 and July 21, 2025, I conferred with counsel for the U.S. Trustee regarding the relief requested herein. Counsel for the U.S. Trustee indicated that he takes no position regarding the relief requested herein.

/s/ Julie Harrison
Julie Harrison